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March 24, 2020

**VIA ECF**

Honorable Cheryl L. Pollak  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Martinez v. City of New York, et al., 1:16-cv-00079-RPK-CLP

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney representing defendants in the above-referenced matter. Defendants write to:

- (i) respectfully inform the Court that, upon information and belief, with the exception of the receipt of certain of plaintiff's medical records and the deposition of defendants' expert, Dr. Salvatore Lenzo, discovery should be complete in this matter;
- (ii) respectfully request that the Court permit the parties to delay the deposition of Dr. Lenzo until the concerns surrounding the current coronavirus pandemic have subsided (with the understanding that plaintiff shall have an ample opportunity to depose Dr. Lenzo well before trial in this matter); and
- (iii) respectfully request a deadline of April 10, 2020 for the parties to file any requests for a pre-motion conference regarding any contemplated motions for summary judgment. Defendants intend to file a request for a pre-motion conference regarding their contemplated partial motion for summary judgment.

Plaintiff takes no position with respect to the present application although the parties did agree previously by telephone to postpone Dr. Lenzo's deposition.

Thank you for your consideration.

Respectfully,

/s/ *Kavin Thadani*

Kavin Thadani  
Senior Counsel  
Special Federal Litigation

cc: **VIA ECF**  
Gabriel Harvis, Esq.  
Baree Fett, Esq.  
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